

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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KAREN J. VAN INGEN, Derivatively on Behalf  
of Nominal Defendant AVEO  
PHARMACEUTICALS, INC.,

Plaintiff,

v.

TUAN HA-NGOC, HENRI A. TERMEER,  
KENNETH M. BATE, ANTHONY B. EVNIN,  
ROBERT EPSTEIN, RAJU KUCHERLAPATI,  
ROBERT C. YOUNG, and KENNETH E. WEG,

Defendants,

and  
AVEO PHARMACEUTICALS, INC.,

Nominal Defendant.

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Civ. A. No. 1:14-cv-11672-DJC

**PLAINTIFF'S MOTION FOR PRELIMINARY  
APPROVAL OF PROPOSED SETTLEMENT AGREEMENT**

Plaintiff Karen Van Ingen, derivatively on behalf of Aveo Pharmaceuticals, Inc., hereby moves, pursuant to Federal Rule of Civil Procedure 23.1(c) for preliminary approval of proposed settlement agreement. In support of this motion, plaintiff has filed the accompanying Memorandum in Support of Motion for Preliminary Approval of Proposed Settlement Agreement and Declaration of Matthew M. Houston, Esq. and exhibits thereto.

WHEREFORE, for the reasons in the accompanying Memorandum of Law and Declaration in support thereof, plaintiff respectfully requests that the Court:

- 1) Preliminarily approve the settlement;
- 2) Approve the form and manner of the Notice; and

3) Schedule a date for the Settlement Hearing to consider final approval of the Settlement and the requested Fee Award.

Dated: August 25, 2016

Respectfully submitted,

Harwood Feffer, LLP

/s/ Robert I. Harwood

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